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IDAHO PUBLIC  
UTILITIES COMMISSION



October 11, 2021

VIA FEDERAL EXPRESS

Jan Noriyuki, Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd. Building 8, Suite 201-A  
Boise, ID 83714

Re: Case No. COL-T-21-01, In the Matter of Columbine Telephone Company, Inc.'s  
Application to Change the Manner in which Facilities Extensions are Handled

Response of Columbine Telephone Company, Inc. to Commission Notice of  
Inquiry

Dear Ms. Noriyuki:

Pursuant to Rule 67 of the Idaho Public Utilities Commission's Rules of Procedure, enclosed are the Confidential Attachments in the above filing. The enclosed materials contain highly confidential financial and proprietary information which, if disclosed, could harm the business operations of the Company. Request is respectfully made that these materials be maintained by the Commission confidentially and public disclosure disallowed.

Questions regarding this filing may be directed to my attention as shown below.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michelle Motzkus".

Michelle Motzkus  
Legal & Regulatory Administrator  
phone: 307-883-6690  
email: mamotzkus@silverstar.net

Enclosures

Columbine Telephone Company, Inc.  
Michelle Motzkus, Legal & Regulatory Administrator  
PO Box 226  
Freedom, WY 83120  
Ph: 307-883-6690  
Fax: 307-883-2575  
Email: mamotzkus@silverstar.net

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF COLUMBINE TELEPHONE )  
COMPANY, INC.'S APPLICATION TO CHANGE ) Case No. COL-T-21-01  
THE MANNER IN WHICH FACILITIES )  
EXTENSIONS ARE HANDLED )

RESPONSE OF COLUMBINE TELEPHONE COMPANY, INC. TO COMMISSION NOTICE OF INQUIRY

Columbine Telephone Company, Inc. dba Silver Star Communications (the "Company") hereby responds to the Notice of Inquiry issued by the Commission on August 16, 2021, as follows.

*Inquiry No. 1. Please provide documentation of the customer requests and feedback that led to the proposed changes in the Company's line extension section of the tariff.*

Response to Inquiry No. 1. Written documentation of customer requests and feedback precipitating the Company's filing of its proposed changes to the line extension section of its Local Exchange Service Tariff No. 3 are not maintained in the ordinary course of its business. However, Silver Star staff have on numerous occasions received feedback from customers on the burdensome and complicated methodology of determining the cost for a line extension. As more fully described in response to Inquiry No. 4 below, a customer request for new line extension under the existing process is lengthy, time consuming and resource intensive.

*Inquiry No. 2. Please report how many new line extensions the Company has installed in its Idaho service territory in the last two years. Please include the average lengths of the line extensions.*

Response to Inquiry No. 2. Confidential Exhibit No. 1, attached, provides detail on new line extensions and calculated line extension lengths, placed by the Company in its service territory over the previous five years<sup>1</sup>. Referenced on Exhibit No. 1 is the average length for a new line extension, calculated based on a five year and two year historical average.

*Inquiry No. 3. Under the existing line extension tariff, provide documentation showing how many feet of fiber, on average, the current \$1600 allowance will cover. Please provide the Commission a schedule showing how the cost of providing copper compares to the cost of providing fiber.*

Response to Inquiry No. 3. The attached Confidential Exhibit No. 2 contains detail on the average amount of fiber covered under the \$1,600 aid to construction. Also provided is a cost comparison of copper over fiber. As illustrated, the calculated average footage provided under the \$1,600 aid to construct varies depending on mode of construction and material costs, and regardless of the type of construction is significantly less than what is proposed by the Company under its pending tariff revision.

*Inquiry No. 4. Please explain how the new proposed line extension tariff will cut installation time down from 2-3 weeks to 2-3 days.*

Response to Inquiry No. 4. Under the existing line extension process, construction of a new line extension can take up to three weeks, because of the multiple steps and touch points with the customer prior to actual installation. Confidential Exhibit No. 3 illustrates a typical installation request and timeline under the existing process compared to the proposed process.

As illustrated, the proposed process substantially reduces the time to construction completion. The time saved benefits the customer resulting in earlier service activation; benefits the Company resulting in more time to address more customer requests, reduced engineering staff time to calculate routes and

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<sup>1</sup> 2021 is included as a reference and counts are subject to change following construction season end and work order closeout.

costs, and fewer truck rolls to engage with customers at initial request; and, benefits the customer through implementation of a simplified process and overall lower cost to the customer.

*Inquiry No. 5. Please provide a cost breakdown example for a 500-foot line extension using both the existing and the new proposed line extension methodology.*

Response to Inquiry No. 5. The cost breakdown using both the current line extension and the proposed line extension methodologies for a 500 foot line extension is detailed on the attached Confidential Exhibit No. 4. As illustrated, the difference in a lower cost to the customer is significant under the proposed new line extension methodology.

As demonstrated, new line extension costs can vary widely; however, based on the average cost to construct, a customer is more likely than not to contribute to the construction cost under the existing methodology. Transitioning to a fixed fee methodology results in certainty to the customer of the cost involved to construct, less confusion and saves the Company and the customer in both time and financial resource expense.

The Company respectfully requests the Commission approve its application to modify its Tariff No. 3 with respect to line extensions, as detailed in its filings herein.

Dated: October 11, 2021

Columbine Telephone Company, Inc.



Michelle Motzkus  
Legal & Regulatory Administrator  
307-883-6690  
PO Box 226  
Freedom, WY 83120